

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

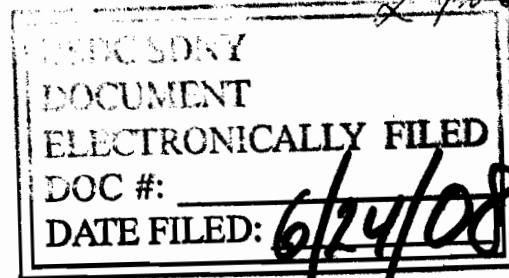
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OLD POINT INTERNATIONAL  
CORPORATION,

*Plaintiff,*

-against-

BRUCE HILL and CHARLES HALE,

*Defendants.*  
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07-CV-8178 (GEL) (MHD)

~~PROPOSED~~ CIVIL CASE  
MANAGEMENT PLAN

After consultation among counsel for all Parties, Defendants Bruce Hill and Charles Hale and Plaintiff Old Point International Corporation respectfully submit and propose the following Civil Case Management Plan pursuant to the Court's directive at the June 10, 2008 hearing herein and Rules 16 and 26(f) of the Federal Rules of Civil Procedure.

Timing of Response to First Amended Complaint

1. On or before July 31, 2008, Defendants shall answer, move or otherwise respond to Plaintiff's First Amended Complaint. If Defendants file a motion to dismiss, Plaintiff's opposition shall be due on or before August 21 and Defendant's reply shall be due on or before September 12.

Timing of Discovery

2. Fact discovery may commence on June 30, 2008 and is to be completed by February 16, 2009. Discovery shall otherwise proceed in accordance with the time and scope limitations contemplated by the Federal Rules of Civil Procedure and the Local Rules of this Court.

Service of Initial Disclosures

3. On or before July 16, 2008, parties shall serve Initial Disclosures under Rule 26(a) of the Federal Rules of Civil Procedure.

Expert Disclosure

4. Expert reports shall be served by Plaintiff on opposing counsel on or before March 13, 2009. Plaintiff's expert(s) shall be made available for deposition within two (2) weeks of service of Plaintiff's expert reports. Expert reports shall be served by Defendants on opposing counsel on or before April 1, 2009. Defendants' expert(s) shall be made available for deposition within two (2) weeks of service of Defendants' expert reports. Rebuttal expert reports responding to issues raised in the initial reports shall be served on opposing counsel on or before April 15, 2009. Each such expert shall be made available for deposition within two (2) weeks of service of his or her expert report.

Summary Judgment Motions

5. Summary judgment motions, if any, are to be served on or before May 15, 2009. Answering papers are to be served no later than June 5, 2009. Reply papers are to be served, and all motions papers are to be filed, on or before June 19, 2009. All motions and applications shall be governed by the Court's Individual Practice Rules, unless otherwise ordered by the Court.


Filing of the Joint Pretrial Order

6. Unless otherwise ordered by the Court, the Parties shall submit to the Court for its approval a joint pretrial order in compliance with the Court's Individual Practice Rules.

Rule 5 Service

7. All papers to be served pursuant to Rule 5 of the Federal Rules of Civil Procedure shall be served on opposing counsel by (a) e-mail and (b) overnight delivery service, or by hand. Papers served upon Plaintiff's counsel under this section should be sent to Judd Burstein and Peter B. Schalk; papers served upon Defendants' counsel under this section should be sent to Susan L. Saltzstein and James R. Carroll. Contact information for these individuals is listed in the signature block below.

SKADDEN, ARPS, SLATE,  
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-and-

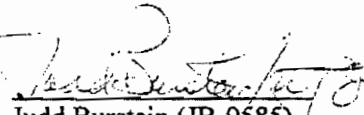
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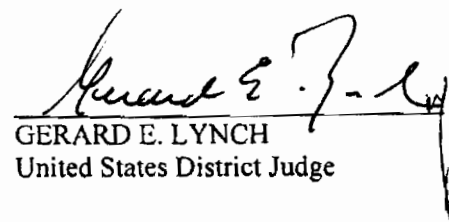
SO ORDERED:

Dated: June 24, 2008  
New York, New York

JUDD BURSTEIN, P.C.

  
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Peter B. Schalk (PBS-8257)  
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Counsel for Plaintiff  
Old Point International Corporation

  
GERARD E. LYNCH  
United States District Judge